

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JANE DOE

Plaintiff,

v.

KERRVILLE INDEPENDENT
SCHOOL DISTRICT

Defendant.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION No.
5:21-cv-00369

PLAINTIFF JANE DOE'S
RULE 26 PRETRIAL DISCLOSURES

Jane Doe files and serves her Rule 26(a)(3) Pretrial Disclosures as required by the Court's Scheduling Order and Federal Rule of Civil Procedure 26(a)(3).

WITNESSES

Jane Doe submits the following list of witnesses that she reasonably expects to call or may call at trial.¹ She reserves the right to modify, amend, or supplement this list at any time before trial. Jane further reserves the right to withdraw any of the following witnesses and to offer additional witnesses as necessary for rebuttal or impeachment.

¹ Should she prevail at trial, Jane intends to call both her undersigned counsel, Heather Lynn Long and Amos Barton, as expert witnesses on attorneys' fees at the time and in the manner designated by the Court. Their addresses and phone numbers are identified below. Jane further intends to present evidence to support their testimony, including but not limited to, the curriculum vitae and billing records of each witness.

NAME	CONTACT INFORMATION	EXPECTS TO CALL	MAY CALL	LIVE/DEPO
Jane Doe	c/o Undersigned Counsel	X		Live
Jane Doe's Father	c/o Undersigned Counsel	X		Live
Jane Doe's Mother	c/o Undersigned Counsel	X		Live
Kerrville Independent School District via Corporate Representative	c/o Defendant's Counsel	X		Live
Mark J. Foust, Ed.D. <i>KISD Superintendent and Title IX Coordinator at the time of the underlying events.</i>	c/o Defendant's Counsel	X		Live
Wade Ivy <i>KISD Assistant Superintendent at the time of the underlying events.</i>	c/o Defendant's Counsel	X		Live
Shelby Balser <i>Principal of Tivy High School at the time of the underlying events.</i>	c/o Defendant's Counsel		X	Live

Chris Cook <i>Vice Principal of Tivy High School at the time of the underlying events.</i>	c/o Defendant's Counsel	X		Live
Fred Brunz <i>Tivy High School JROTC instructor at the time of the underlying events.</i>	c/o Defendant's Counsel	X		Live
Kerr County Constable Paul Gonzales <i>Tivy High School Resource Officer at the time of the underlying events.</i>	c/o Kerr County Constable, Precinct 3 700 Main Street Kerrville, Texas 78028 830.792.2240	X		Depo
Kendall Young, Ed.D. <i>Lead Counselor at Tivy High School at the time of the underlying events.</i>	3509 La Cumbre Drive Kerrville, Texas 78028 830.377.5911	X		Live
Jason Beard, Investigator <i>Kerrville Police Department officer who investigated the underlying events.</i>	c/o Kerrville Police Department 429 Sidney Baker St. Kerrville, Texas 78028 830.257.8181	X		Live
Allison Baker <i>Custodian of records for the KPD.</i>	c/o Kerrville Police Department 429 Sidney Baker St. Kerrville, Texas 78028 830.257.8181		X	Live

<p>Aaron Chatagnier</p> <p><i>Tivy High School teacher who sexually abused Jane Doe while she was a student at KISD.</i></p>	<p>c/o Clay Steadman Law Offices of Jesko & Steadman 612 Earl Garrett Street Kerrville, Texas 78028 830.257.5005</p>		X	Live
<p>Micah Wrase, M.S., LSSP</p> <p><i>Counselor/Student Family Services Tivy High School at the time of the underlying events.</i></p>	<p>c/o Shreiner University 2100 Memorial Boulevard Kerrville, Texas 78028 830.792.7258</p>		X	Live
<p>April McComack-Haas</p> <p><i>Tivy High School teacher who participated in the underlying events.</i></p>	<p>c/o Defendant's Counsel</p>		X	Live
<p>Julie Jones</p> <p><i>Tivy High School teacher who participated in the underlying events.</i></p>	<p>108 N Cynthia Drive Kerrville, Texas 78028 830.370.9447</p>		X	Live
<p>Kim Starry</p> <p><i>Tivy High School teacher who participated in the underlying events.</i></p>	<p>c/o Defendant's Counsel</p>		X	Live
<p>Karen Cook</p> <p><i>Hill Country High School employee at the time of the underlying events.</i></p>	<p>c/o Defendant's Counsel</p>		X	Live

<p>Steve Schwarz</p> <p><i>Hill Country High School Principal at the time of the underlying events.</i></p>	c/o Defendant's Counsel		X	Live
<p>Dana Mast</p> <p><i>Tivy High School student who reported Tivy teacher Julie Jones for sexually harassing and retaliating against Jane Doe.</i></p>	Plaintiff will supplement.		X	Live
<p>Allison Hauge</p> <p><i>Tivy High School student who informed Principal Shelby Balser that she witnessed Jane Doe say that Aaron Chatagnier had "hooked up" with her.</i></p>	Plaintiff will supplement.		X	Live
<p>Carol Shakeshaft, Ph.D.</p> <p><i>Jane Doe's expert. Her expected testimony is detailed in Plaintiff's Expert Disclosures, her deposition, and her expert report.</i></p>	c/o Undersigned Counsel	X		Live
<p>Lisa Watts</p> <p><i>Jane Doe's expert. Her expected testimony is detailed in Plaintiff's Expert Disclosures, her deposition, and her expert report.</i></p>	c/o Undersigned Counsel	X		Live

Jane further reserves the right to call any and all individuals or entities disclosed by either party as having information relevant to this lawsuit.

WITNESSES BY DEPOSITION

Jane submits the following page line designations deposition testimony for those witnesses she expects to call or may call at trial by deposition. She further reserves the right to withdraw any of the following designations and to offer additional designations and to call additional witnesses by deposition as necessary for rebuttal or impeachment.

In the event any witness designated as expected to testify live becomes unavailable, Jane reserves the right to call that witness by deposition.

1. Constable Paul Gonzales Page Line Designations

8:9-80:9

81:15-149:19

150:5-151:23

153:16-21

154:13-158:18

160:3-163:23

165:7-167:24

TRIAL EXHIBITS

Jane submits the following list of exhibits that she reasonably expects to offer or may offer at trial. She reserves the right to withdraw any of the following exhibits in whole or in part and to offer additional exhibits as necessary for rebuttal and impeachment.

EXHIBIT NO. (DOE - __)	NAME	REFERENCE
1	05.07.2018 KISD Letter "Notification on Aaron Chatagnier, SS# [REDACT]"	KISD0002627-2629
2	12.06.2017 Chatagnier Email "Re: student"	KISD0002609
3	12.08.2017 Chatagnier Email "Re: Meeting"	KISD0002637
4	02.07.2018 KISD "Memo of Concern" Letter to Aaron Chatagnier	KISD0002634-2635
5	02.08.2018 Ivy Email "RE: [Jane Doe]"	KISD0001911-1912
6	02.12.2018 Ivy Email with Voicemail "195250.wav" and corresponding voice file	KISD0001926, voice file KISD0001927
7	02.12.2018 Ivy Email with Voicemail "195349.wav" and corresponding voice file	KISD0001928, voice file KISD0001929
8	02.15.2018 Kendall Young Email "Fw: [DOE, JANE]"	KISD0002611
9	02.21.2018 Ivy Email "RE: My takeaway"	Doe001103-1105
10	03.02.2018 Kendall Young Email "Events-3/1 3/2"	KISD0002612
11	03.02.2018 KISD Written Directive to Aaron Chatagnier	KISD0003622-3624
12	04.27.2018 Shelby Balser Handwritten Notes	KISD0002615
13	04.30.2018 Wade Ivy Handwritten Notes "Meeting with Aaron Chatagnier"	KISD0002616-2619
14	04.30.2018 Shelby Balser Handwritten Notes	KISD0002620-2625
15	Micah Wrase Handwritten Notes	KISD0002209-2215
16	04.13.2018 Shelby Balser Handwritten Notes	KISD0002613

17	<p>April 13, 2018 Video begins 9:34:23 am</p> <p>April 13, 2018 Video begins 9:46:20 am</p> <p>April 13, 2018 Video begins 9:47:56 am</p> <p>April 13, 2018 Video begins 9:48:23 am</p> <p>April 13, 2018 Video begins 9:48:47 am</p> <p>April 13, 2018 Video begins 10:09:46 am</p> <p>April 13, 2018 Video begins 10:09:56 am</p> <p>April 13, 2018 Video begins 10:11:14 am</p>	KISD0003620, 3616, 3611, 3619, 3615, 3614, 3612, 3610,
18	April 5, 2018 Video begins 9:47:48 am	KISD0003617
19	Tivy High School Floor Plan	KISD0005940-5941
20	Shelby Balser Handwritten Notes "Speak w/ every teacher on the wing. . . ."	KISD0002640
21	Picture of Jane Doe Cited for Dress Code Violation	Doe001140
22	Picture of Student Allowed to Violate Dress Code	Doe001131
23	2015-2016 JROTC Leadership Camp Picture	Doe001130
24	Texas VW Classic Homepage	Doe001107-1110
25	Chatagnier Text to Jane Doe	Doe001089
26	Shelby Balser "Aaron Chatagnier Timeline"	KISD0002632-2633
27	Mr. C Hall Passes for Jane Doe	KISD0002630-2631
28	Professional Boundary Self-Assessment Notated by Balser	KISD0002636
28	Reference Sheet and Professional Boundaries Self-Assessment	KISD0005262-5263
29	Wade Ivy "Documentation on AC" with Handwritten Notations	KISD0002638-2639
30	05.04.2017 Sexual Harassment Records	KISD0002702-2707

31	05.01.2018 Letter Announcing Chatagnier Resignation for Personal Reasons	KISD0003520
32	05.02.2018 Mrs. Doe Emails "RE: [Jane Doe]"	KISD0001893, 1894-1895
33	05.02.2018 Mrs. Doe Emails "RE: [Jane Doe]"	KISD0002001
34	05.02.2018 Balser Email "RE: [Jane Doe]"	KISD0001798-1799, 1843
35	05.02.2018 Balser Email "RE: [Jane Doe]"	KISD0001854-1855
36	05.07.2018 Ivy Email "FW: KISD Superintendent Report	KISD0002991
37	Aaron Chatagnier Employment File	KISD0003521-3550
38	06.09.2020 KISD Letter "Notification on Aaron Chatagnier, SS# [REDACT]"	KISD0002995
39	Jane Doe Education Records KISD sent to the Texas Attorney General as "Exhibit C"	KISD0002474-2603
40	Jane Doe "Monthly Job Report" Assignment	KISD0002610, Doe001106
41	04.03.2018 Dana Mast P3 Harassment Report Re: Julie Jones	KISD0003605
42	04.03.2018 Jane Doe P3 Harassment Report Re: Julie Jones	KISD0003606
43	04.03.2018 Anonymous P3 Harassment Report Re: Julie Jones	KISD0003608
44	P3 Documentation	KISD0006336-6339
45	KISD P3 Webpage	Doe001156 -1158
46	Student Discipline Records	KISD0000026-27, 36, 44, 49, 40
47	Doe Student Activities Report	KISD0000053-54

48	Doe Student Picture	KISD0000061
49	Doe Student Attendance Record	KISD0000083-84, 47
50	Doe Student Guidance Record	KISD0000067
51	Doe Student Information Report	KISD0000074-82
52	Doe Student Records Audit Trial	KISD0000085-86
53	Jane 2, Tivy o Picture	KISD0001902
54	Student Record- At Risk Status	KISD0000045
55	04.11.2018 Progress Report- Doe	KISD0002298
56	Jane Doe Tivy HS At Risk Tab	KISD0002262-2263
57	Jane Doe High School Transcript (04.11.2018)	KISD0002298
58	Doe Student Grade History Records- Tivy and HCHS	KISD0000021-21, 33-34
59	Hill Country High School Enrollment Records	KISD0002278-2290
60	05.02.2018 HCHS Email with Voicemail "202699.wav" and corresponding voice file	KISD0002150, voice file KISKISD0002151
61	05.04.2018 Ivy Email "RE: Thank You."	KISD0001791
62	05.04.2018 Balser Email "RE: Thank You."	KISD0001859
63	05.29.2018 Mrs. Doe Email "Re: referral"	KISD0002015-2016
64	09.08.2017 Jane Doe Written Statement	KISD0003031-3033
65	09.08.2017 Wade Ivy Notes	KISD0002604-2608
66	09.13.2017 Holly Vogt Email "FW: Job Complete: Important Information from Kerrville ISD and attached "report.pdf"	
67	09.28.2017 Kendall Young Email "Re: [Jane Doe]"	KISD0002170

68	09.15.2017 Mrs. Doe Email "Fwd:" (with attachments)	KISD0001914-1916
69	09.15.2017 KISD Letter to Col Edwards	KISD0003036
70	09.15.2017 Laura Fowler Email "RE: Thank You For Reaching Out Mr. Locke"	
71	09.15.2017 Dr. Mark Foust Email "Important Message of Support"	KISD0003076
72	09.18.2017 Edwards Resignation Letter	KISD0003037
73	09.18.2017 Laura Fowler Email "FW: Letter of Resignation"	KISD0003038
74	News Articles Re: Two KISD Teachers Committing Educator Sexual Misconduct News Articles Re: Two KISD Teachers Committing Educator Sexual Misconduct	Doe001072-1085
75	Jane Doe JROTC Cadet Student Records	KISD0002200-2208
76	09.21.2017 Holly Vogt Email "Press Release" and attached Press Release "Kerrville ISD Responds to Two Separate Allegations"	KISD0003077, 3078-3479
77	09.21.2017 Dr. Mark Foust Email "prep statement for press conf."	KISD0003090
78	Press Release: Tivy AFJROTC Earns Highest Attainable Unit Rating of "Exceeds Standards" Press Release: Tivy High AFJROTC Earns Distinguished Unit With Merit Award Press Release: Tivy High School Student Receives New AFJROTC Flight Academic Scholarship	Doe001067-1071
79	09.26.2017 Paul Gonzales Email "Media"	KISD0002669

80	10.11.2017 Ivy Email "RE: Christopher Edwards" with attachment "SBEC Report Edwards Complete 92017.pdf"	KISD0002688, 2689-2836
81	10.17.2017 Ivy Email "RE: School Investigation Training"	KISD0002837
82	Texas Education Agency Subpoena (notated) and Related Documents	KISD0003004-3024
83	Defendant's Rule 26 Disclosures	
84		
85	03.24.2021 Wade Ivy Emails "RE: AG Response"	KISD-000001-4 (Initial Disclosure Production)
86	Attorney General Response to KISD Request to Withhold Jane Doe's Education Records from Jane Doe	KISD-000005-114 (Initial Disclosure Production)
87	KISD Request to Withhold Jane Doe's Education Records from Jane Doe	KISD-000173-180 (Initial Disclosure Production)
88	12.14.2020 KISD Incomplete Production of Jane Doe's Education Records	KISD-000181-000312 (Initial Disclosure Production)
89	09.25.2017 Wade Ivy Letter to Mr. and Mrs. Doe	KISD0001788
90	11.13.2017 Fred Brunz Email "I Need Your Help With [Jane's] Uniforms"	KISD0002140
91	English Class Script- 2017 English Class Plan Speech 2017 English Class Plan Day 2 Speech 2017	Produced on 04.25.2023 without Bates Stamp
92	09.15.2017 KISD Letter to Parents/Guardians	KISD0003456
93	09.18.2017 Dr. Mark Foust Email "RE: Story for next week"	KISD0003069-3071

94	09.13.2017 KISD Letter to Parents/Guardians	KISD0003073
95	09.15.2017 Dr. Mark Foust Email "Important Message of Support"	KISD0003076
96	Hill Country High School Graduation Pictures	Doe001128-1129
97	Tivy High School Class of 2019 Graduation Pictures	KISD0006014, 6132, 5977, 5999
98	Jane Doe Kerrville ISD Standardized Test/Taks Results	KISD0002302
99	Jane Doe Final High School Transcript	KISD0002265
100	HCHS Records re Jane Doe College Applications	KISD0002216-2242
101	01.25.2019 Karen Cook Email with Voicemail "224672.wav" and corresponding voice file	KISD0001946, voice file KISKISD0001947
102	Doe Class Rank Spreadsheet-Native Format	KISD0000070
103	02.28.2019 Jane Doe Email "Fwd: [Jane's] Admission Application is still Incomplete" (University of Texas San Antonio)	KISD0002002-2003
104	02.27.2019 Jane Doe Email "Re: Application for Texas A&M San Antonio"	KISD0002005-2006
105	Jane Doe Tivy HS Graduation Information and Endorsement Tab	KISD0002261, 2269
106	Student Career Plan Report	KISD0000030,268
107	Full KISD High School Transcript- Doe	KISD0000002
108	Doe 9th Grade Final Report Card	KISD0000003
109	09.07.2017 Transcript for 2015-2016 and 2016-2017 School Years	KISD0000043

110	Jane Doe Tivy HS GPA Summary	KISD0002256-2258
111	Jane Doe Class Rank Summary	KISD0002259-2260
112	Jane Doe Activity Tab	KISD0002264
113	Doe001141, Doe MSJ Response Exhibit B-1	
114	News Article Re: Jane Doe Lawsuit	Doe001087-88
115	09.16.2017 Emily Sieker Facebook Message to Jane Doe	Doe001132-1135
116	01.15.2021 KISD Superintendent Friday Report	KISD0003416-3418
117	01.22.2021 KISD Superintendent Friday Report	KISD0003094-3095
118	7.15.2022 KISD Superintendent Friday Report	KISD0006241-6242
119	07.28.2022 Dr. Mark Foust Email "FW: Request for comment on lawsuit" from The Kerrville Daily Times	Produced in Native Form on 03.20.2023
120		
121	10.02.2020 Ivy Email "RE: Draft press release"	KISD0006253-6256
122	<p>01.25.2025 KISD Email to Hill Country Community Journal "KISD Statement on Former Teacher Indictment" and "012521 Former Teacher Indictment Statement.pdf"</p> <p>01.25.2025 KISD Email to The Kerrville Daily Times "KISD Statement on Former Teacher Indictment" (also attaching "012521 Former Teacher Indictment Statement.pdf")</p>	Produced in Native Form on 03.20.2023

	01.25.2021 KISD Email to Fox SA Puro San Antonio "KISD Release" (also attaching "012521 Former Teacher Indictment Statement.pdf")	
123	Facebook Posts Re: Chatagnier Indictment	Doe00728-730, 1055-1062
124	01.10.2022 Balser Handwritten Notes	KISD0006190-6191
125	Chatagnier, Edwards, D'Spain Professional Development Portfolios	KISD0006428-64
126	KISD Board Policy EHBC (Legal) (10.26.2017)	KISD0006396-6408
127	KISD Board Policy EHBC (Legal) (07.02.2018)	KISD0006409-6421
128	KISD Board Policy EHBC (Local) (02.19.2018)	KISD0006422
129	Expert Report of Charol Shakeshaft, PhD, MS	Doe Expert Disclosures Exhibit D
130	Charol Shakeshaft, PhD, MS Curriculum Vitae	Doe Expert Disclosures Exhibit A
131	Lisa M. Watts, Psy.D. Curriculum Vitae	Doe Expert Disclosures Exhibit E
132	Expert Report of Lisa M. Watts, Psy.D.	Doe Expert Disclosures Exhibit G
133	09.28.2017 Jane Doe Email "RIP"	KISD0002152-2153
134	Educator Ethics for Substitute Teachers	KISD0005847-558848
135	D'Spain Employment File	KISD0006257-6335
136	Kendal Young Deposition, Exhibit 2	
137	Kendal Young Deposition, Exhibit 3	
138	Kendal Young Deposition, Exhibit 4	
139	Kendal Young Deposition, Exhibit 5	

140	Kendal Young Deposition, Exhibit 10	
141	Kendal Young Deposition, Exhibit 19	
142	Kendal Young Deposition, Exhibit 1	
143	David P. Thompson, Ph.D Deposition, Exhibit 2	
144	David P. Thompson, Ph.D Deposition, Exhibit 3	
145	David P. Thompson, Ph.D Deposition, Exhibit 4	
146	David P. Thompson, Ph.D Deposition, Exhibit 5	
147	David P. Thompson, Ph.D Deposition, Exhibit 6	
148	David P. Thompson, Ph.D Deposition, Exhibit 7	
149	David P. Thompson, Ph.D Deposition, Exhibit 8	
150	David P. Thompson, Ph.D Deposition, Exhibit 9	
151	David P. Thompson, Ph.D Deposition, Exhibit 10	
152	David P. Thompson, Ph.D Deposition, Exhibit 11	
153	David P. Thompson, Ph.D Deposition, Exhibit 12	
154	David P. Thompson, Ph.D Deposition, Exhibit 13	
155	David P. Thompson, Ph.D Deposition, Exhibit 14	

156	David P. Thompson, Ph.D Deposition, Exhibit 15	
157	David P. Thompson, Ph.D Deposition, Exhibit 18	
158	David P. Thompson, Ph.D Deposition, Exhibit 22	
159	David P. Thompson, Ph.D Deposition, Exhibit 23	
160	David P. Thompson, Ph.D Deposition, Exhibit 25	
161	David P. Thompson, Ph.D Deposition, Exhibit 27	
162	David P. Thompson, Ph.D Deposition, Exhibit 28	
163	David P. Thompson, Ph.D Deposition, Exhibit 29	
164	David P. Thompson, Ph.D Deposition, Exhibit 32	
165	David P. Thompson, Ph.D Deposition, Exhibit 33	
166	David P. Thompson, Ph.D Deposition, Exhibit 34	
167	David P. Thompson, Ph.D Deposition, Exhibit 35	
168	David P. Thompson, Ph.D Deposition, Exhibit 36	
169	David P. Thompson, Ph.D Deposition, Exhibit 37	
170	David P. Thompson, Ph.D Deposition, Exhibit 38	

171	David P. Thompson, Ph.D Deposition, Exhibit 39	
172	David P. Thompson, Ph.D Deposition, Exhibit 40	
173	David P. Thompson, Ph.D Deposition, Exhibit 42	
174	David P. Thompson, Ph.D Deposition, Exhibit 43	
175	David P. Thompson, Ph.D Deposition, Exhibit 44	
176	David P. Thompson, Ph.D Deposition, Exhibit 45	
177	David P. Thompson, Ph.D Deposition, Exhibit 46	
178	David P. Thompson, Ph.D Deposition, Exhibit 55	
179	David P. Thompson, Ph.D Deposition, Exhibit 56	
180	David P. Thompson, Ph.D Deposition, Exhibit 58	
181	David P. Thompson, Ph.D Deposition, Exhibit 62	
182	2015-2016 KISD Employee Handbook (Excerpts)	KISD0004790-4797, 4800-4803, 4816-4829, 4835-4840
183	2016-2017 KISD Employee Handbook (Excerpts)	KISD0005069-5076, 5079-5081, 5096-5108, 5115-5121
184	2017-20118 KISD Employee Handbook (Excerpts)	KISD0004162-4170, 4173-4175, 4194-4206, 4214-4220
185	2019-2020 KISD Employee Handbook (Excerpts)	KISD0005003-5012, 5016-5020, 5038-5052, 5059-5065

186	August 2017 Student Code of Conduct PowerPoint	Doe001094-1102
187	2017-2018 KISD School Calendar	Doe001086
188	Memorandum of Understanding	KISD0006186-6189
189	Recognizing and reporting sexual misconduct under the Educator Discipline Act	KISD0003745-3766
190	Texas Educators' Ethics Training	KISD0004652 (native and pdf print with notes)
191	KISD Required Annual Training Sexual Harassment Training - 2021-2022	KISD0004461-4473
192	PowerPoint "ethics_Module1_1cut down" titled "Texas Educators' Ethics Training"	Produced 03.20.2023 in native form and submitted in pdf print with notes
193	Dr. Mark Foust December 2016-July 2022 Professional Development Profile	KISD0005393
194	2017-2018 KISD Student Handbook	KISD0005539-5636
195	12.08.2017 Memorandum to KISD Board of Trustees "Re: Localized Policy Manual Update 109 (Excerpts)	KISD0004016-4022, 4024, 4028-4030, 4032-4033, 4037, 4049-4051, 4059-4062, 4068-4069, 4079-4084, 4093, 4094-4097, 4102, 4120, 4121-4129, 4143, 4144-4149, 4157-4159
196	KISD Legislative Update, 85th Legislative Session 2017 (Wade Ivy, 08.01.2017)	KISD0004460, 5637
197	KISD Board Policy FL (Local, Legal)	Doe000686-7113
198	KISD Board Policy FFI (Local)	KISD0005628-5829
199	KISD Board Policy FFG (Exhibit)	KISD0003970-3971
200	KISD Board Policy DIA (Exhibit)	KISD0003678

201	KISD Board Policy DIA (Local)	KISD0003686-3689
202	KISD Board Policy DHB (Legal)	KISD0005305-5309
203	KISD Board Policy DH (Local, Legal, Exhibit)	KISD0005352-5354, 4845-4846, 5305-5309
204	KISD Board Policy FFF (Local)	KISD0004143
205	KISD Board Policy FFH (Local, Legal, Exhibit)	KISD0003664, 4962-4967, 3690-3696
206	06.04.2020 KISD Superintendent Friday Report	KISD0003441-3442

Respectfully Submitted,



HEATHER LYNN LONG

Texas Bar No. 24055865

heather@heatherlonglaw.com

HEATHER LONG LAW PC

4310 North Central Expressway

Dallas, Texas 75206

Phone: (214) 699-5994

AMOS L. BARTON

Texas Bar No. 24031847

Abarton@carlsonattorneys.com

THE CARLSON LAW FIRM, P.C.

301 Junction Highway, Suite 100

Kerrville, TX 78028

Phone: (830) 257-7575

Fax: (830) 257-7580

ATTORNEYS FOR JANE DOE

CERTIFICATE OF SERVICE

Counsel certifies that a true and correct copy of these Rule 26 Pretrial Disclosures were filed and served on all parties through the Court's ECF system on December 23, 2023 due to a technical issue.

A handwritten signature in black ink, appearing to read 'H. Long', is positioned above a horizontal line.

HEATHER LYNN LONG

